

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2019-239-E

In the Matter of:	)	
	)	
Dominion Energy South Carolina,	)	
Incorporated's Request for Approval	)	
of an Expanded Portfolio of	)	
Demand Side Management	)	PETITION TO INTERVENE
Programs, and a Modified Demand	)	
Side Management Rate Rider	)	
	)	
	)	

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The South Carolina State Conference of the NAACP, the South Carolina Coastal Conservation League, and Southern Alliance for Clean Energy (collectively, “Petitioners”) hereby petition the South Carolina Public Service Commission (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules. In support of this petition, Petitioners state as follows:

1. On June 28, 2019, Dominion Energy South Carolina, Incorporated’s (“DESC” or “the Company”)<sup>1</sup> filed a Request for Approval of an Expanded Portfolio of Demand Side Management Programs and a Modified Demand Side Rate Rider. In its filing, DESC (i) submits for review the results of its comprehensive potential study and demand reduction and energy efficiency program analysis (together, Demand Side Management or “DSM”) programs for the Commission’s review; (ii) requests approval of its proposed suite of ten modified DSM programs for an extended five-year term with authorization to modify, expand, amend, terminate, or add any measure or program

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<sup>1</sup> South Carolina Electric & Gas Company (“DESC”) changed its name to Dominion Energy South Carolina, Inc. effective April 29, 2019. This Memorandum uses “DESC” or “the Company” to refer to the Company both before and after this name change.

without prior Commission approval; and (iii) petitions the Commission for authorization to update its “Rider to Retail Rates – Demand Side Management Component” to provide for the recovery of DESC’s costs, net lost margin revenue, and shared savings incentive associated with its DSM programs. The six-year period approved by the Commission for DESC’s current DSM programs expires on November 26, 2019, but DESC requests that this docket be heard on a schedule that allows its requested changes to be made effective December 1, 2019.

2. The South Carolina Coastal Conservation League (“CCL”) is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is 131 Spring Street, Charleston, South Carolina 29403. As an advocate for demand side management and energy efficiency, CCL and its members support the development of energy policy that is in the public interest of South Carolinians and promotes energy savings. CCL has members in South Carolina who receive electricity service from DESC and would be subject to the impacts of the Company’s demand side management and energy efficiency (“DSM/EE”) programs and rider. CCL was a party to Docket No. 2009-261-E, and to the settlement agreement adopted and approved by the Commission in Order No. 2010-472, in which the Commission approved DESC’s initial DSM/EE programs and rider.

3. Southern Alliance for Clean Energy (“SACE”) is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE’s principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina, and South Carolina. SACE has members

who receive electricity service from DESC and are subject to the impacts of DESC's proposed DSM/EE programs and rider. SACE and its members are interested in promoting greater reliance on demand side management and energy efficiency to meet South Carolina's energy needs.

4. The South Carolina Conference of the NAACP ("South Carolina NAACP") is a nonpartisan, nonprofit civil rights organization founded in 1939, with its principal place of business located in Columbia, South Carolina. The South Carolina NAACP is the leading civil rights organization in South Carolina and is made up of 54 active branches and councils/chapters with approximately 8,425 individual members throughout the state of South Carolina, including the DESC service area. Those South Carolina NAACP members would be subject to the direct impacts of DESC's proposed DSM/EE programs and rider. The South Carolina NAACP's primary focus is the protection of the civil rights of all people; ensuring equity in the areas of education, healthcare access and environmental justice, criminal justice, voting rights, political engagement, and economic sustainability; and expanding youth and young adult engagement.

5. Petitioners CCL and SACE have participated in prior DESC annual DSM update dockets (CCL participated in docket nos. 2011-49-E, 2012-55-E, 2013-50-E, 2014-44-E, 2015-45-E, 2016-40-E, 2017-35-E, and 2018-42-E; and SACE participated in docket nos. 2012-55-E, 2013-50-E, 2014-44-E, 2015-45-E, 2016-40-E, 2017-35-E, and 2018-42-E), as well as Docket No. 2013-208-E, in which DESC's current cost-recovery and incentive mechanism was established. Petitioners CCL and SACE also participate in the DESC DSM advisory group process established in Docket No. 2009-261-E.

6. Petitioners seek to intervene in this proceeding to advocate for their members' interests in promoting energy savings through demand side management and energy efficiency. Petitioners plan to evaluate DESC's application and present the results of their evaluation to the Commission to ensure that DESC's proposed portfolio of DSM/EE programs and rider will allow the Company to achieve maximum cost-effective energy savings.

7. Petitioners plan to submit testimony and participate in an evidentiary hearing as parties of record with the right of cross-examination. Petitioners may wish to testify and present evidence at any evidentiary hearing, but have not yet developed an estimate of the time required for their presentation.

8. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 20th day of August, 2019.

s/ Stinson W. Ferguson

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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the Petition to Intervene of the South Carolina State Conference of the NAACP, the South Carolina Coastal Conservation League, and Southern Alliance for Clean Energy.

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August 20, 2019